

Comments before the
Federal Communications Commission
Washington, D.C.
April 18, 2002

With regards to: RM-10413

I have been a licensed radio amateur since 1977 and I have been a member of the American Radio Relay League for nearly as long. In this particular matter, I disagree with the position that the ARRL has taken with regards to the refarming of the existing Novice band allocations. The ARRL Petition for Rule Making before the FCC incorporates issues other than their refarming proposal. I have no comment on these other matters.

At its simplest level, this proposal seeks to expand the voice portions of the amateur bands at the expense of CW and Digital enthusiasts. The ARRL purports that the Novice segments are “underutilized” and they claim to have arrived at a “consensus” view on the matter.

“Underutilized” is quite obviously a relative term. I could easily make the claim that the 10 GHz amateur allocation is seriously underutilized. Would the ARRL agree to relinquish that allocation on the simple basis of lack of wide use?

The “consensus” that the ARRL claims to have achieved in this matter is completely bogus. At last count, there were nearly 700,000 US amateurs. Membership in the ARRL accounts for only one quarter of that total. Of that number, only 4744 responded to their survey. Their survey was available online (on their Members Only Web site) as well as in one issue of QST magazine. Amateur operators who are not members of the ARRL could not have easily participated in this survey.

Even if you accept that their survey was widely available (it was not), the 4744 respondents couldn't agree in significant number on any of the ARRL proposals. So you have 60% of 4744 amateurs, (out of some 700,000 total) who think that “something” should be done with the Novice spectrum. Based on that pitifully small response, the ARRL claims it has achieved a “consensus” in the matter.

I humbly request that the Federal Communications Commission reject the refarming plan as proposed by the American Radio Relay League. As I have clearly demonstrated, their arguments to do so are completely without merit.

In addition, I would like to point out to the Commissioners that our country is presently at war. Time and again the amateur service has proven invaluable in its service to the public. Why should we endanger existing amateur communication networks (HF CW Nets) that have been long established simply to allow a little

more “elbow room” for voice operators? While those Nets may not operate in the Novice portions of the band, loss of that spectrum will cause a migration of CW and Digital operators down into already well-used portions of the bands where those Nets operate. That could create a substantial risk that a communications disruption could occur.

This proposal should be shelved for a few years so that the amateur service can;

1. Evaluate its evolving role in supporting Homeland Security.
2. Allow the seed of digital experimentation to germinate. Who knows, one new technology discovery could make it more prudent to downsize the phone bands in favor of more digital spectrum in the near future.
3. Allow the dust to settle from the recent license restructuring. To say that amateur operators have seen a flurry of changes in the last few years is a major understatement. The service needs a sense of stability if it is to survive.
4. Arrive at a real consensus on what should be done with the existing Novice spectrum.

I appreciate your time in reviewing and considering my comments to this Proposal for Rule Making.

Sincerely,

Jeffrey L. Davis, N9AVG
9100 W. Tulip Tree Drive
Muncie, IN 47304 USA